



Implementation:

Six Years into the CLCPA

Ken Girardin
Nov. 6, 2025



Manhattan
Institute



CLCPA:

The First Autopsy

A thick, blue, slanted bar graphic that runs diagonally from the top-left towards the bottom-right, passing behind the text.

The Law

The Law

Renewable Mandate

- 70% from renewables by 2030
- “Zero Emission” by 2040

Reduced Emissions

- 40% cut from 1990 by 2030
- “Net zero” by 2050

The Law

32 2. In considering and issuing permits, licenses, and other administra-
33 tive approvals and decisions, including but not limited to the execution
34 of grants, loans, and contracts, all state agencies, offices, authori-
35 ties, and divisions shall consider whether such decisions are inconsis-
36 tent with or will interfere with the attainment of the statewide green-
37 house gas emissions limits established in article 75 of the
38 environmental conservation law. Where such decisions are deemed to be
39 inconsistent with or will interfere with the attainment of the statewide
40 greenhouse gas emissions limits, each agency, office, authority, or
41 division shall provide a detailed statement of justification as to why
42 such limits/criteria may not be met, and identify alternatives or green-
43 house gas mitigation measures to be required where such project is
44 located.

Status

CLCPA Signed
8/2019

WE ARE HERE

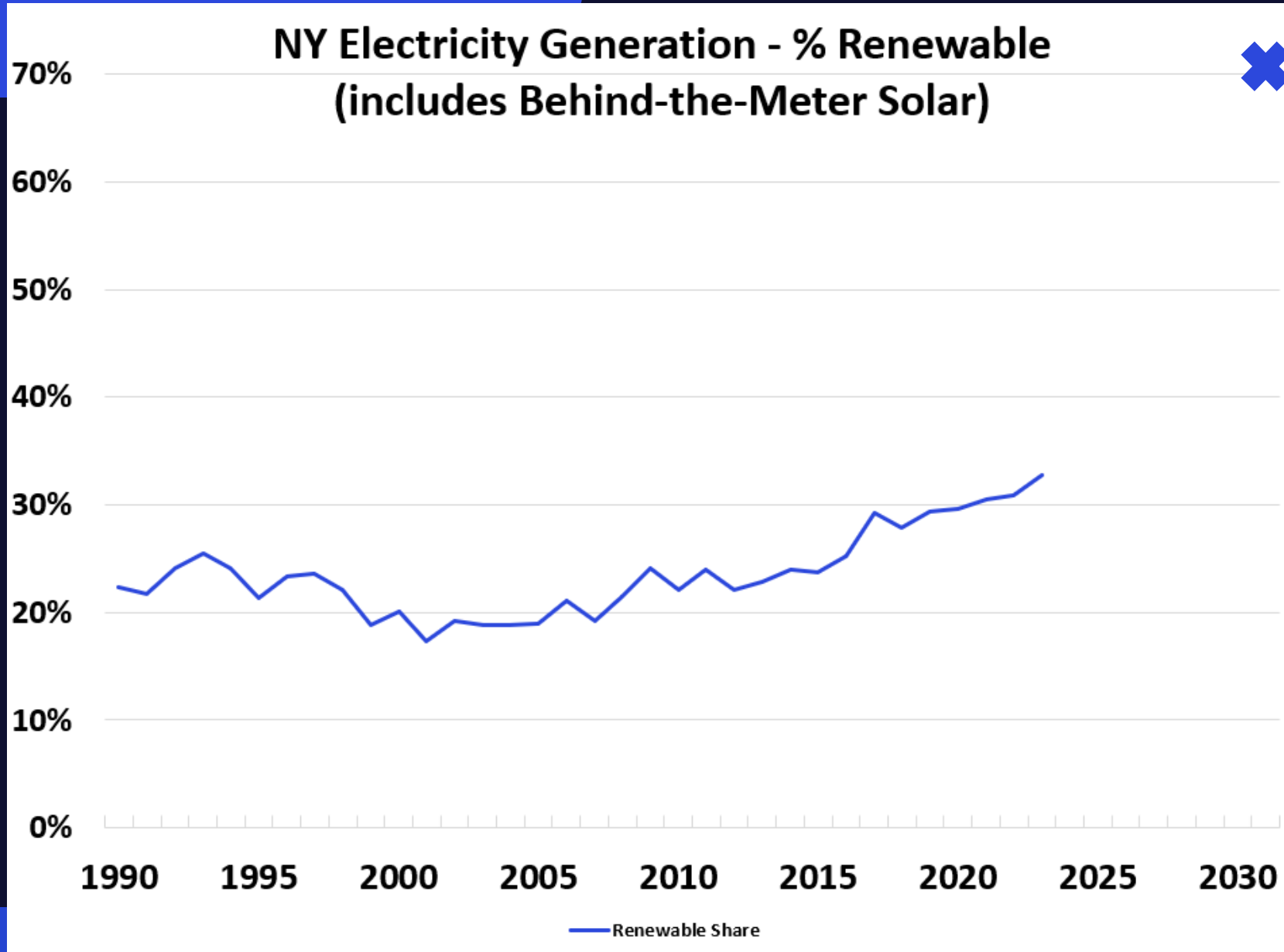
-40% TARGET
2030

DEC
BLOCKS
PLANT
UPGRADES
10/2021

CLIMATE
ACTION
PLAN
12/2022

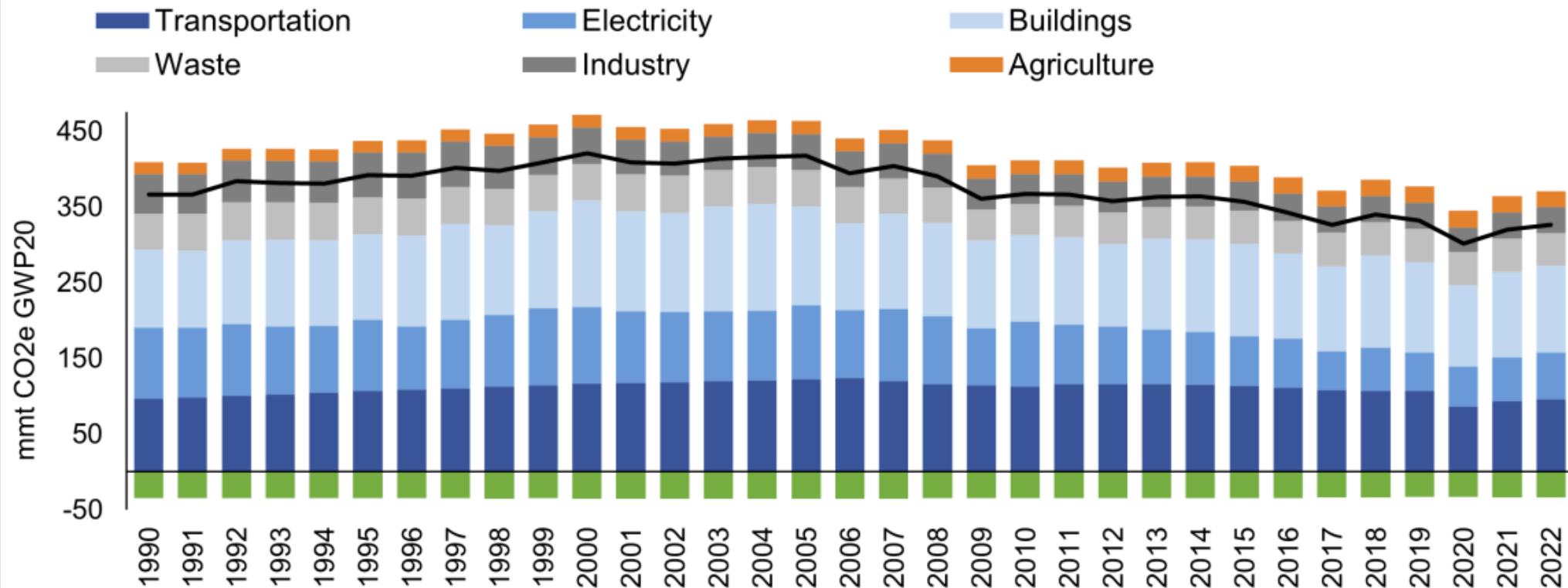
DEC
REGS
DUE
1/2024

Status

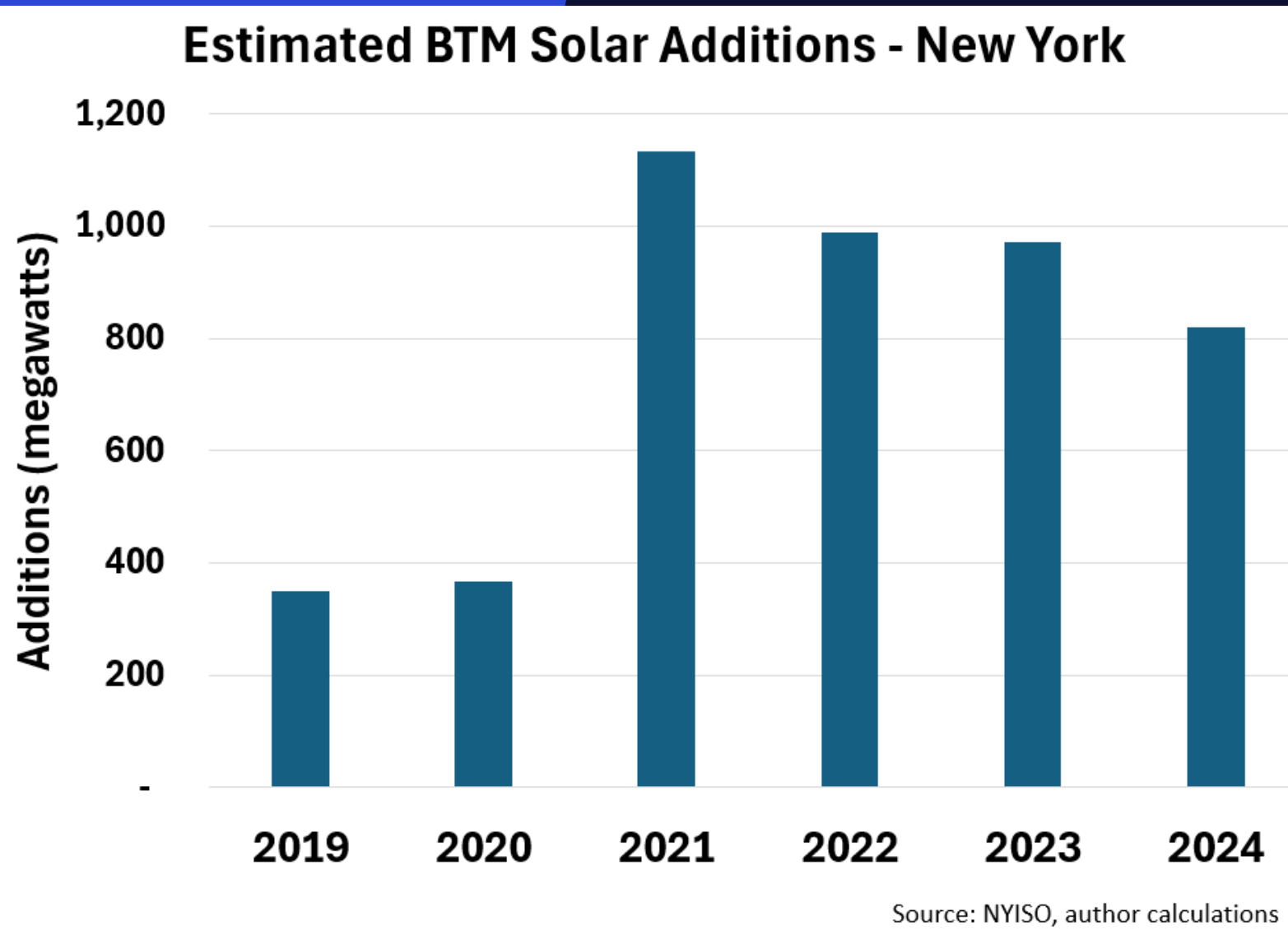


Status

Figure ES.3: NYS Statewide Emissions by Economic Sector, 1990-2022 (mmt CO₂e GWP20)



Status



Status

CLCPA Signed
8/2019

WE ARE HERE

-40% TARGET
2030

Status

CLCPA Signed
8/2019

WE ARE HERE

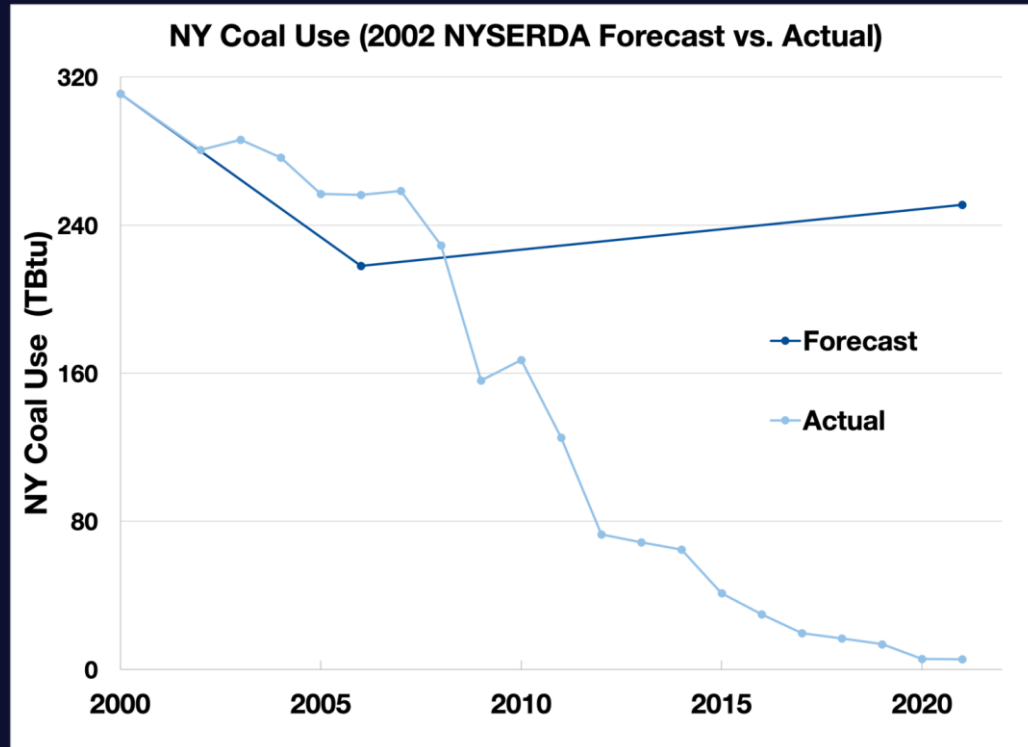
-40% TARGET
2030

NEW-
40%
TARGET
2036*

The Problem

- **Government is effective at:**
 - Regulating (including banning)
 - Taxing
 - Spending, If Targeted Carefully
- **Government is ineffective at:**
 - “Navigating”/ “Transforming”
 - Seeing the big picture/assessing risk
 - Predicting the future

The Problem



CLCPA Today

- **DEC is 21 months late issuing regs**
- **NYSERDA holding over \$2B in treasuries/cash**
- **NYISO forecasting shortfalls and saying more new dispatchable electricity is needed**
- **Emissions are higher than they need to be**

The Way Forward

- **Uncertainty is the enemy**
- **Stop treating job loss as a positive**
- **Stop using the wrong benchmarks**

• Legislature needs to clarify b



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